



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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IN REPLY REFER TO:

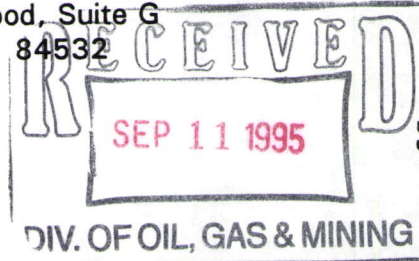
Moab District
Grand Resource Area
82 East Dogwood, Suite G
Moab, Utah 84532

3809

(UTU-72499)

(UT-068)

Mr. Pat Gochmour
Gochmour & Associates
P.O. Box 3207
Englewood, Colorado 80155



SEP 07 1995

Re: Deficiencies in proposed 43 CFR 3809 Plan of Operations UTU-72499

Dear Mr. Gochmour:

Thank you for meeting on August 10, 1995 with BLM management and staff at the Moab District Office and submitting, along with Mr. Robert Prescott of Summo USA Corporation, Summo's proposed plan of operations for copper mining in the Lower Lisbon Valley area of San Juan County, Utah. We have assigned this proposed plan the BLM case file number UTU-72499. Please refer to this number in all future correspondence with us regarding this plan of operations.

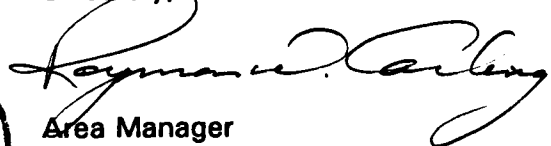
In order to meet the requirements of the National Environmental Policy Act (NEPA), this plan will require the preparation of an Environmental Impact Statement (EIS), due to the acreage involved and the scope of proposed operation. Our staff has made a preliminary review of Summo's proposed plan of operations in accordance with 43 CFR 3809.1-6. While finding the document to be well prepared and in general adequate for NEPA analysis, a number of deficiencies have been found that will need to be addressed by Summo before the NEPA analysis can proceed. Therefore please provide in writing the following information:

- (1) Acreage by land status (i.e., BLM, State, private) for each of the proposed disturbance areas shown on page 5. Also, please indicate acreage for the area of ore stockpiles referred to on page 10.
- (2) The number of cubic yards corresponding to the tonnage figures shown on pages 7 through 10; please include the volume conversion and % swelling factors used for these determinations. As with #1, a breakdown by land status would be very helpful. This volume information will be critical in reclamation bond calculations.
- (3) Information on the manner in which Summo intends to address livestock grazing concerns. There are at least two grazing permittees in the area. Each permittee must be given a two-year notice (which includes appeal provisions) before their permit can be altered; however, this time period could be reduced through agreement between the permittee and BLM.

- (4) Information on the manner in which Summo intends to address stream drainage problems in proposed disturbance areas, especially in the area of Sentinel #1 pit and waste dump; each of these two disturbances would directly impact existing drainages.
- (5) Please discuss alternatives to the use of high evaporation sprinklers, referred to on page 38 of UTU-72499, for reducing the sulfuric acid-bearing heap leach pad solution inventory. BLM has wind contamination-related concerns about this proposed reduction method.
- (6) Some incorrect land status information is present on Figure 1-3 with regard to certain land within the project boundary in T30S, R26E. In Section 30, the SW1/4 SW1/4 is, according to our latest Master Title Plat private land, while in Section 31, the W1/2 NW1/4 and the NW1/4 SW1/4 are also indicated as being private land.
- (7) Please indicate that the Figure 1 you refer to on page 7 (3.1.2) is Figure 1-3. Also, it would be helpful to mention Summo's Plant Site Plan (part of Attachment 2) when referring to Figure 1-3 on page 19.
- (8) With reference to access roads (page 25), please discuss planned road closures and/or re-alignments, if any.

Finally, plans (page 37) for allowing pit walls and benches to be filled with pit wall colluvium, rather than filling them with available waste rock is of great concern to us; this issue must be thoroughly analyzed in the EIS. If you have questions, please contact Lynn Jackson or Sal Venticinque of my staff; their respective work telephone numbers are (801) 259-2150 and (801) 259-2141.

Sincerely,


Area Manager



cc: Mr. Robert A. Prescott
Summo USA Corporation
P.O. Box 847
Moab, Utah 84532

Mr. Anthony A. Gallegos
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